

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

WILUS INSTITUTE OF STANDARDS AND
TECHNOLOGY INC.

v.

HP INC.

WILUS INSTITUTE OF STANDARDS AND
TECHNOLOGY INC.

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC.

WILUS INSTITUTE OF STANDARDS AND
TECHNOLOGY INC.

v.

ASKEY COMPUTER CORP., ASKEY
INTERNATIONAL CORP.

WILUS INSTITUTE OF STANDARDS AND
TECHNOLOGY INC.

v.

HP INC.

WILUS INSTITUTE OF STANDARDS AND
TECHNOLOGY INC.

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC.

WILUS INSTITUTE OF STANDARDS AND
TECHNOLOGY INC.

v.

ASKEY COMPUTER CORP., ASKEY
INTERNATIONAL CORP.

Case No. 2:24-cv-00752-JRG-RSP
(Lead Case)

JURY TRIAL DEMANDED

Case No. 2:24-cv-00746-JRG-RSP
(Member Case)

Case No. 2:24-cv-00753-JRG-RSP
(Member Case)

Case No. 2:24-cv-00764-JRG-RSP
(Member Case)

Case No. 2:24-cv-00765-JRG-RSP
(Member Case)

Case No. 2:24-cv-00766-JRG-RSP
(Member Case)

**UNOPPOSED MOTION FOR ENTRY OF
SUPPLEMENTAL QUALCOMM PROTECTIVE ORDER**

Plaintiff Wilus Institute of Standards and Technology, Inc. (“Wilus”), respectfully moves unopposed for entry of the below Supplemental Qualcomm Protective Order to accommodate the request of non-party Qualcomm, Incorporated (“Qualcomm”). Qualcomm has indicated that entry of the Supplemental Qualcomm Protective Order is necessary “[b]efore Qualcomm will produce any confidential source code.”

Defendants HP Inc., Samsung Electronics Co. Ltd., Samsung Electronics America, Inc., Askey Computer Corp, and Askey International Corp. (collectively, “Defendants”) do not oppose this motion.

Dated: July 25, 2025

Respectfully submitted,

/s/ Neil A. Rubin

Marc Fenster
CA State Bar No. 181067
Email: mfenster@raklaw.com
Reza Mirzaie
CA State Bar No. 246953
Email: rmirzaie@raklaw.com
Dale Chang
CA State Bar No. 248657
Email: dchang@raklaw.com
Neil A. Rubin
CA State Bar No. 250761
Email: nrubin@raklaw.com
Jacob Buczko
CA State Bar No. 269408
Email: jbuczko@raklaw.com
Jonathan Ma
CA State Bar No. 312773
Email: jma@raklaw.com
Mackenzie Paladino
NY State Bar No. 6039366
Email: mpaladino@raklaw.com

RUSS AUGUST & KABAT
12424 Wilshire Blvd. 12th Floor
Los Angeles, CA 90025
Telephone: 310-826-7474

Of Counsel:
Andrea L. Fair
State Bar No. 24078488
MILLER FAIR HENRY, PLLC
1507 Bill Owens Parkway
Longview, TX 75604
(903) 757-6400 (telephone)
(903) 757-2323 (facsimile)
E-mail: andrea@millerfairhenry.com

**ATTORNEYS FOR PLAINTIFF,
Wilus Institute of Standards and
Technology Inc.**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a) and served via email on all counsel of record on this 25th day of July, 2025.

/s/ Neil A. Rubin

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that pursuant to Local Rule CV-7(h) counsel for Wilus has conferred with counsel for Defendants and the relief requested in this motion is unopposed.

/s/ Neil A. Rubin